

AO 91 (Rev. 11/11) Criminal Complaint

FILED
RICHARD W. NAGEL
CLERK OF COURT

12/2/21

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTONUnited States of America
v.

SCOTT WILLIAM REED

Case No. 3:21-mj-427

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/16/2018 to 3/20/2019 in the county of Hamilton & Montgomery in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2422(b)	Coercion and Enticement
18 U.S.C. § 1470	Transfer of Obscene Materials to Minors
18 U.S.C. §§ 2252(a)(2) & (b)(1)	Receipt of Child Pornography (three counts)
18 U.S.C. §§ 2252(a)(4)(B) & (b)(2)	Possession of Child Pornography

This criminal complaint is based on these facts:


SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.


Complainant's signature

Andrea R. Kinzig, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone (*specify reliable electronic means*)Date: 12/2/21City and state: DAYTON, OHIO

Peter B. Silvain, Jr.

United States Magistrate Judge



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Andrea R. Kinzig, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and have been so employed since 2005. I am currently assigned to the Dayton, Ohio Resident Agency of the Cincinnati Field Office. In connection with my official duties, I investigate violations of federal criminal laws, including offenses pertaining to the illegal production, distribution, receipt, and possession of child pornography (in violation of 18 U.S.C. §§ 2252(a) and 2252A) and coercion and enticement (in violation of 18 U.S.C. § 2422). I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in various forms of media, including computer media.
2. Along with other agents, officers, and investigators of the FBI and Centerville (Ohio) Police Department, I am currently involved in an investigation of child pornography and child exploitation offenses committed by **SCOTT WILLIAM REED** (hereinafter referred to as "**REED**"). Based on the investigation conducted to date, there is probable cause to believe that **REED** possessed child pornography, in violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2); received child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1); coerced and enticed a minor to engage in illegal sexual activities, in violation of 18 U.S.C. § 2422(b); and transferred obscene material to minors, in violation of 18 U.S.C. § 1470. I submit this Affidavit in support of a criminal complaint.
3. As part of the investigation, I have reviewed documentation and reports provided by and discussed information with other agents, officers, and investigators involved in the investigation. For purposes of this Affidavit, I have not distinguished between information of which I have direct knowledge and that of which I have hearsay knowledge.
4. This Affidavit is intended to show that there is sufficient probable cause to demonstrate that **REED** committed the offenses alleged in the Complaint. It does not contain every fact known to the investigation.

PERTINENT FEDERAL CRIMINAL STATUTES

5. 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2) state that it is a violation for any person to knowingly possess, or knowingly access with the intent to view, one or more matters which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer, if the producing of such visual depiction

involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

6. 18 U.S.C. §§ 2252(a)(2) and (b)(1) state that it is a violation for any person to knowingly receive or distribute any visual depiction using any means or facility of interstate or foreign commerce or that has been mailed, shipped, or transported in or affecting interstate or foreign commerce or which contains materials which have been mailed or so shipped or transported, by any means including by computer, or to knowingly reproduce any visual depiction for distribution using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or through the mails, if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct, or attempt to do so.
7. 18 U.S.C. § 1470 states that it is a violation for any person to knowingly use the mail or any facility or means of interstate or foreign commerce to transfer obscene matter to another individual who has not attained the age of 16 years, knowing that such other individual has not attained the age of 16 years, or attempts to do so.
8. 18 U.S.C. § 2422(b) states that is a violation for any person to use the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so.
 - a. For purposes of the statute, 18 U.S.C. § 2427 states that the term “sexual activity for which any person can be charged with a criminal offense” includes the production of child pornography, as defined in section 2256(8).

BACKGROUND INFORMATION

Definitions

9. The following definitions apply to this Affidavit:
 - a. “**Child Pornography**” includes the definition in Title 18 U.S.C. § 2256(8) (any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct).

- b. **“Visual depictions”** include undeveloped film and videotape, and data stored on computer disk or by electronic means, which is capable of conversion into a visual image (see 18 U.S.C. § 2256(5)).
- c. **“Minor”** means any person under the age of eighteen years (see 18 U.S.C. § 2256(1)).
- d. **“Sexually explicit conduct”** means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person (see 18 U.S.C. §§ 2256(2) and 1466A(f)).
- e. **“Child erotica”**, as used herein, means materials or items that are sexually arousing to persons having a sexual interest in minors but that are not necessarily obscene or do not necessarily depict minors engaging in sexually explicit conduct.
- f. An **“Internet Protocol address”**, also referred to as an **“IP address”**, is a unique numeric address that computers or electronic devices use in order to communicate with each other on a computer network utilizing the Internet Protocol (IP) standard. Every computer or device connected to the Internet is referenced by a unique IP address. An IP address can be thought of as the equivalent to a street address or a phone number, just as each street address and phone number uniquely identifies a building or telephone. IP addresses are composed of four sets of digits known as “octets,” ranging in value from 0-255, separated by decimal points. An example of an IP address is 192.168.10.102. There are two types of IP addresses; static and dynamic. A static address is permanently assigned to a particular device and as a practical matter never changes. A dynamic address provided by an Internet service provider to a client computer is valid only for the duration of the session that the client computer is connected to the Internet (or other network).
- g. **“Website”** consists of textual pages of information and associated graphic images. The textual information is stored in a specific format known as Hyper-Text Mark-up Language (HTML) and is transmitted from web servers to various web clients via Hyper-Text Transport Protocol (HTTP).
- h. **“Uniform Resource Locator”** or **“Universal Resource Locator”** or **“URL”** is the unique address for a file that is accessible on the Internet. For example, a common way to get to a website is to enter the URL of the website’s home page file in the Web browser’s address line. Additionally, any file within that website can be specified with a URL. The URL contains the name of the protocol to be used to access the file resource, a domain name that identifies a specific computer on the

Internet, and a pathname, a hierarchical description that specifies the location of a file in that computer.

- i. **“Social Media”** is a term to refer to websites and other Internet-based applications that are designed to allow people to share content quickly, efficiently, and on a real-time basis. Many social media applications allow users to create account profiles that display users’ account names and other personal information, as well as to exchange messages with others. Numerous forms of social media are presently available on the Internet.

Messenger Applications

10. Snapchat is a social media communication application owned by Snap Inc., a company based in Santa Monica, California. The application is available on cellular telephones and tablets. The application provides a means to send and receive “self-destructing” messages, pictures, and videos.
11. A “snap” is a picture or video message taken and shared with other Snapchat users in real-time. The sender of a snap has the option of setting a timer for how long a snap can be viewed. Once a snap has been viewed, it is deleted from the company’s system and is no longer visible to the recipient. Snapchat users can send text messages to others using the Chat feature. Once a user leaves the Chat screen, messages viewed by both the sender and receiver will no longer be visible. The application notifies other users when they are online so they can begin messaging each other. In addition, Snapchat users can send pictures to other users by utilizing the camera on their device. Pictures can also be sent from the saved pictures in the photo gallery of the device.
12. A user can type messages and send photos, videos, audio notes, and video notes to friends within the Snapchat application using the “Chat” feature. A user sends a Chat message to a friend, and once it is viewed by both parties – and both parties swipe away from the Chat screen – the message will be cleared. Within the Snapchat application itself, a user can opt to save part of the Chat by tapping on the message that he or she wants to keep. The user can clear the message by tapping it again.
13. Kik is a cross-platform instant messenger application available on smartphones. The application allows users to exchange text-based conversations with one another and to share media such as photos, YouTube videos, and other content.
14. The Kik messenger application is administered by MediaLab.ai Inc., a company based in Santa Monica, California. The application can be downloaded free of charge from the Internet. It requires a smartphone with either a data plan or access to a Wi-Fi network to use.

15. Unlike many other smartphone instant messenger applications that are based on a user's telephone number, Kik uses usernames to identify its users. Each user selects and is assigned a unique user name for use on Kik's platform. Each user also creates a user profile, which includes a first and last name and an email address. MediaLab.ai Inc. does not verify this information, and as such, users can provide inaccurate information.
16. Based on my training and experience, I know that individuals involved in child pornography and child exploitation offenses have utilized various social media and messenger applications such as Snapchat and Kik to trade child pornography files and to communicate with other offenders and victims.

Cloud Storage

17. Cloud computing has become an increasingly popular way for both individuals and businesses to store and maintain data. Cloud computing is the delivery of computing services – including servers, storage, databases, networking, software, analytics, and intelligence – over the Internet (the “cloud”). Cloud computing utilizes computer resources delivered as a service over a network (typically the Internet). Resources are distributed across a variety of remote data centers in different locations.
18. Dropbox is an on-line cloud storage, photo backup, and file manager service. The service is administered by Dropbox Inc., a company based in San Francisco, California.
19. Mega is a cloud storage and file hosting service offered by Mega Limited, an Auckland, New Zealand-based company. Mega is known for its security feature where all files are end-to-end encrypted locally before they are uploaded. This encryption prevents anyone from accessing the files without knowledge of the pass key.
20. Both Dropbox and Mega provide their users with the ability to share files or folders with others. One means of sharing files or folders is by creating a “sharing link”. A sharing link creates a URL to store the file(s) or folder(s) so that others can access, view, and/or download them. These sharing links can be sent to others via text messages, email, and various messenger applications. Users can limit who can access their sharing links by setting passwords and/or expiration dates for the links.
21. Based on my training and experience, I know that individuals involved in child pornography offenses frequently store their child pornography files in cloud storage accounts such as Dropbox and Mega. I also know, based on my training and experience, that individuals often trade child pornography files by sending sharing links to their cloud storage accounts.

FACTS SUPPORTING PROBABLE CAUSE

Prior Investigation and Conviction of REED

22. In or around July 2018, an adult male (who will be referred to for purposes of this Affidavit as “Adult Male A”) reported to the Centerville Police Department that he had found inappropriate communications on the cellular telephone utilized by his daughter (who will be referred to for purposes of this Affidavit as “Minor A”). Minor A was 12 years old at the time, and she and her father resided in Centerville, Ohio. Adult Male A reported that the communications were exchanged between Minor A’s Snapchat account and another individual utilizing the Snapchat username of “memedaddy45”. Adult Male A further reported that he saw Snapchat communications in which the memedaddy45 account user sent Minor A a picture of a male’s erect penis and a video of a male masturbating.
23. Again in or around July 2018, officers of the Centerville Police Department learned that Minor A’s friend (who will be referred to for purposes of this Affidavit as “Minor B”) had also communicated via Snapchat with the memedaddy45 account user. Minor B lived in Centerville, Ohio and was 14 years old at the time of the communications. Similar to Minor A, Minor B also reportedly received a video file depicting a male’s penis from the memedaddy45 account user.
24. On or around March 20, 2019, officers of the Centerville Police Department arrested **REED** at his residence in Colerain Township, Ohio for Disseminating Matter Harmful to Juveniles, in violation of Ohio Revised Code (O.R.C.) Section 2907.31(A)(1). Officers collected a Samsung Galaxy Note 9 cellular telephone from **REED**’s person pursuant to his arrest.
25. Subsequent to his arrest, **REED** was advised of his Miranda rights and agreed to be interviewed. Below is a summary of some of the information provided by **REED** during the interview:
 - a. **REED** was informed that he was being arrested for Disseminating Matter Harmful to Juveniles. **REED** stated that he thought that the charge probably related to him “being nasty with someone under 18” (or words to that effect).
 - b. **REED** admitted that he had a Snapchat account, but he stated that the account was in his true name. **REED** denied utilizing any other Snapchat account names.
 - c. **REED** was asked to provide the password for his Samsung Galaxy Note 9 cellular telephone, but he refused.
 - d. The interview was terminated at **REED**’s request.
26. On or around March 29, 2019, an indictment was returned by the Montgomery County (Ohio) Court of Common Pleas charging **REED** with 15 counts of Disseminating Matter

Harmful to Juveniles, in violation of O.R.C. Section 2907.31(A)(1) (pursuant to case 2019CR805). On or around June 19, 2019, **REED** pled guilty to eight of the counts in the indictment. The remaining counts were dismissed. On or around July 18, 2019, **REED** was sentenced to 18 months of imprisonment.

27. The charges contained in the indictment noted above solely related to **REED**'s communications with Minor A, Minor B, and a Centerville Police Department detective posing as Minor A. Although the Centerville Police Department, and later the FBI, continued to investigate **REED**'s activities, the charges to which **REED** pled guilty did not involve the contents on his Samsung Galaxy Note 9 cellular telephone or his Snapchat communications with other users.

Snapchat Communications

28. On or around July 18, 2018, and again on or around November 14, 2018, search warrants were authorized by the Kettering (Ohio) Municipal Court compelling Snapchat Inc.¹ to produce records for the memedaddy45 Snapchat account. Below is a summary of some of the records received from Snapchat Inc. in response to the two search warrants:
- a. The memedaddy45 account was created on or around December 14, 2016.
 - b. Recovered from the account were more than 800 messages exchanged between the memedaddy45 account and other users during the approximate time periods of July 11, 2018 through July 17, 2018 and November 9, 2018 through November 13, 2018. These messages had either been saved by the account user, had not yet expired based on the timer set by the sender, or were unread (as further detailed in the background section of the Affidavit).
 - c. Attached to approximately six of the messages that the memedaddy45 account user sent to other users were images of a white male who appears to be **REED**. Attached to numerous other messages that the memedaddy45 account user sent to other users were images of a white male's erect penis and videos of a white male masturbating (although the individual's face could not be seen in these images and videos).
 - d. Some of the individuals with whom the memedaddy45 account user communicated specifically identified themselves by their ages as being minors. It appeared, based on the context of the communications, that some of the other users were also minors. Some of the communications with these individuals (hereinafter collectively referred to as "suspected minors") included the following:
 - i. The memedaddy45 account user sometimes identified himself by the name of "Ryan". The memedaddy45 account user also sometimes identified that he was 16, 17, or 18 years old. Examples of these communications are

¹ Although the company is currently known as "Snap Inc.", it utilized the name "Snapchat Inc." in 2018.

described below in the preceding paragraphs.

1. Based on my training and experience, I know that individuals involved in child exploitation offenses often falsely portray their names, ages, and/or the locations where they reside as a means to conceal their identities from law enforcement officers. It is not uncommon for such offenders to create multiple identities, sometimes involving different ages and genders. Offenders sometimes fictitiously portray themselves as juveniles as a means to gain trust and rapport with victims.
 - ii. A number of the suspected minors made comments indicating that the memedaddy45 account user had sent them images and videos of a male's genitalia. The messages containing those possible images and videos were often times no longer saved in the memedaddy45 Snapchat account. However, there was at least one occasion in which a video depicting a male masturbating was sent to a suspected minor, and the video was still saved in the account. Many of the suspected minors appeared to be upset by seeing the possible images and videos of the male genitalia. Examples of these communications are described below in the preceding paragraphs.
 - iii. The memedaddy45 account user sometimes asked the suspected minors for pictures of themselves. He sometimes asked for general pictures of the suspected minors, but other times he asked for nude pictures of them. Examples of these communications are described below in the preceding paragraphs.
29. Pursuant to the investigation, approximately 13 of the suspected minors were contacted and interviewed (hereinafter collectively referred to as "identified minors"). These identified minors were approximately 11 years old through 15 years old at the time of their communications with the memedaddy45 account user. All of the identified minors confirmed that they were in fact the users of the respective Snapchat accounts. Some of the identified minors did not specifically recall the communications with the memedaddy45 account based on the passage of time and/or the number of people with whom they communicated. However, some of the identified minors did in fact recall the communications.
30. By way of example, below is a summary of some of the communications with the identified minors and suspected minors, as well as some of the information provided by the identified minors:

Minor C:

- a. In or around November 2020, a minor female who will be referred to for purposes of

this Affidavit as “Minor C” was contacted and interviewed. Minor C is presently 15 years old and resides in Montgomery County, Ohio. Minor C identified that she was the user of one of the Snapchat accounts with whom the memedaddy45 account user communicated. However, Minor C did not recall her communications with the memedaddy45 account user.

- b. The records provided by Snapchat Inc. included communications between the memedaddy45 account user and Minor C’s account during the approximate time period of July 16, 2018 through July 17, 2018. Based on the communications, it appeared that the memedaddy45 account user solicited Minor C for a video of her “face and boobs” and then for her “butt and pussy”. It appeared, based on the context of the communications, that Minor C sent the memedaddy45 account user videos in response to his requests. However, the videos were not saved in Snapchat Inc.’s records. It therefore is reasonable to believe that Minor C either sent the videos via another social media platform, or that the timer on the messages containing the videos had expired and the files were automatically deleted from the memedaddy45 Snapchat account². The memedaddy45 account user also sent Minor C a video of him masturbating. Furthermore, the memedaddy45 account user requested to meet with Minor C and said that he wanted to “make out” with her.
 - i. Based on my training and experience, I know that the memedaddy45 account user’s requests for videos from Minor C (specifically, the request for a video of her “butt and pussy”) are consistent with someone attempting to coerce and entice a minor to produce child pornography.
 - ii. Also based on my training and experience, I believe that the video **REED** sent to Minor C is obscene.
- c. Based on their dates of birth, I determined that Minor C was approximately 11 years old and **REED** was approximately 23 years old at the time of the communications between the memedaddy45 account and Minor C’s Snapchat account. Below are excerpts from their communications:

memedaddy45:	Do you like loli ³ ?
memedaddy45:	Wanna see me cum?
Minor C:	Yes
memedaddy45:	Ok send me a vid with face and boobs and I will

² I know, based on my training and experience, that individuals who exchange nude images and videos with minors often take extra precautions when sending and receiving these files – such as setting more restrictive timers on the Snapchat messages and/or deleting the files after they have been viewed.

³ “Lolita”, sometimes shortened to “loli”, is often used as a term to refer to prepubescent or adolescent female children who are attractive and sexually promiscuous. The term originated from a novel about an affair between a man and his 12-year old stepdaughter. Based on my training and experience, I know that “Lolita” and “loli” are search terms that individuals sometimes utilize to search for child pornography files.

memedaddy45: Omfg I'm gonna cum
 Minor C: Show me
 memedaddy45: 1 more vid like that? Maybe with butt and pussy too?
 Minor C: Show me first and then we'll see
 memedaddy45: Saved it
 memedaddy45: *Sends video file depicting a white male masturbating (sent on or around July 16, 2018)*
 memedaddy45: Hi baby
 Minor C: Hi baby
 memedaddy45: Did you like that video
 Minor C: Yesssss
 memedaddy45: I loved yours so much
 memedaddy45: I can't wait to meet you
 Minor C: Me too
 memedaddy45: Wanna do something tomorrow night
 Minor C: Maybe

 memedaddy45: Can I pick you up?
 memedaddy45: I wanna make out
 Minor C: Me too
 memedaddy45: Wya

Minor D:

- d. In or around October 2020, a minor female who will be referred to for purposes of this Affidavit as "Minor D" was contacted and interviewed. Minor D is presently 18 years old and resides in Hamilton County, Ohio. Minor D identified that she was the user of one of the Snapchat accounts with whom the memedaddy45 account user communicated. Minor D recalled her communications with the memedaddy45 account user. Below is a summary of some of the information provided by Minor D about these communications:
- i. Minor D communicated with the memedaddy45 account user when she was 15 years old. The memedaddy45 account user initially contacted Minor D on Snapchat. They communicated for a period of approximately five months solely via Snapchat.
 - ii. Around the time that they first met, Minor D told the memedaddy45 account user that she was 15 years old.
 - iii. The memedaddy45 account user solicited Minor D for nude pictures of her, including pictures of her breasts and buttocks. He also asked her to send him videos of her putting her fingers or hairbrush into her vagina. Minor D estimated that she sent the memedaddy45 account user approximately five to

10 nude pictures of herself, but she never sent him any videos.

1. Based on my training and experience, I know that the memedaddy45 account user's requests for pictures and videos from Minor D are consistent with someone attempting to coerce and entice a minor to produce child pornography.
 - iv. Minor D was shown two images that were recovered from the memedaddy45 account that were sent from her account to the memedaddy45 account (as recovered from the records provided by Snapchat Inc.). One of these images depicted a female's nude vagina, and one image depicted a female's nude breast (as further detailed below). Minor D identified that she was depicted in both of the images.
 - v. The memedaddy45 account user sent Minor D pictures and videos of his nude genitalia and of him masturbating. Minor D estimated that the memedaddy45 account user sent her approximately five to 10 of these pictures and videos.
 - vi. The memedaddy45 account user told Minor D that they could be "fuck buddies" (or words to that effect) to help with each other's pleasures. He instructed her not to tell others about their relationship.
 - e. The records provided by Snapchat Inc. included communications between the memedaddy45 account user and Minor D's account during the approximate time period of November 11, 2018 through November 13, 2018 and on or around July 25, 2018. During these communications, Minor D sent the memedaddy45 account user pictures of her nude vagina and nude breast.
 - f. Based on their dates of birth, I determined that Minor D was approximately 14 and 15 years old and **REED** was approximately 23 years old at the time of the communications between the memedaddy45 account and Minor D's Snapchat account. Below are excerpts from their communications:

Minor D:	Yes
Minor D:	Can I show you something
memedaddy45:	Yes
Minor D:	<i>Sends close-up image of a female's nude vagina</i>
 - i. As detailed above, Minor D identified that she was the individual depicted in this image. Based on my training and experience, I believe that this image depicts child pornography.
- memedaddy45: Fuck hole?

Minor D: Yep
memedaddy45: Sends tits?
Minor D: *Sends close-up image of a female's chest, with her shirt pulled
down to expose one of her nude breasts*

- i. As detailed above, Minor D identified that she was the individual depicted in this image.

Minor E:

- g. In or around November 2020, a minor female who will be referred to for purposes of this Affidavit as "Minor E" was contacted and interviewed. Minor E is presently 17 years old and resides in Clermont County, Ohio. Minor E identified that she was the user of one of the Snapchat accounts with whom the memedaddy45 account user communicated. Minor E recalled her communications with the memedaddy45 account user. Below is a summary of some of the information provided by Minor E about these communications:
 - i. Minor E communicated with the memedaddy45 account user years ago, possibly when she was around 14 or 15 years old. The memedaddy45 account user talked to Minor E about inappropriate things, so she later blocked him.
 - ii. Minor E told the memedaddy45 account user that she was 14 or 15 years old. The memedaddy45 account user told Minor E that he was 17 years old.
 - iii. The memedaddy45 account user solicited Minor E for nude pictures of her, including pictures of her nude body, cleavage, breasts, buttocks, and genitals. Minor E never sent any of these pictures to the memedaddy45 account user.
 - iv. On multiple occasions, the memedaddy45 account user sent Minor E pictures of his nude penis and videos of him masturbating.
- h. The records provided by Snapchat Inc. included communications between the memedaddy45 account user and Minor E's account during the approximate time period of July 15, 2018 through July 16, 2018. During these communications, the memedaddy45 account user talked to Minor E about his penis.
- i. Based on their dates of birth, I determined that Minor E was approximately 13 years old and **REED** was approximately 23 years old at the time of the communications between the memedaddy45 account and Minor E's Snapchat account. Below are excerpts from their communications:

memedaddy45: Do you need to get out of the house

Minor E: Can't not allowed
 Minor E: But yea
 memedaddy45: Dang
 Minor E: Yea
 memedaddy45: I'llake you feel better
 Minor E: No your dick won't make me feel better like fr? Last thing on my mind
 memedaddy45: You need daddy dick

Minor F:

- j. In or around November 2020, a minor female who will be referred to for purposes of this Affidavit as "Minor F" was contacted and interviewed. Minor F is presently 14 years old and resides in Clermont County, Ohio. Minor F identified that she was the user of one of the Snapchat accounts with whom the memedaddy45 account user communicated. When shown copies of the communications, Minor F advised that they looked familiar, but that she did not recall the details.
- k. The records provided by Snapchat Inc. included communications between the memedaddy45 account user and Minor F's account during the approximate time period of July 12, 2018 through July 15, 2018. During the communications, the memedaddy45 account user told Minor F that he was 17 years old. Based on the context of communications, it appeared that the memedaddy45 account user sent Minor F a picture of his penis. However, the picture was not saved in Snapchat Inc.'s records. It therefore is reasonable to believe that the timer on the messages containing the picture had expired, and the file was automatically deleted from the memdaddy45 Snapchat account. Minor F told the memedaddy45 account user that she did not like receiving this picture.
- l. Based on their dates of birth, I determined that Minor F was 12 years old and **REED** was 23 years old at the time of the communications between the memedaddy45 account and Minor F's Snapchat account. Below are excerpts from their communications:

Minor F: Your gross
 memedaddy45: Why
 Minor F: You sent a dick pic
 memedaddy45: So?
 memedaddy45: How old are you
 Minor F: 15
 Minor F: How old are you
 memedaddy45: 17
 Minor F: Sike bitch im 12
 memedaddy45: That explains it you're a kid

Minor F: I'm bigger than you
memedaddy45: Prove it
Minor F: Why the fuck is you sending a Dick picture to a young ass
kid? Tf do you think you are?
memedaddy45: You are childish

.
memedaddy45: You couldn't fit my dick in your mouth lil ass girl
memedaddy45: No faces cause you're all ugly
memedaddy45: Exactly
memedaddy45: Ugly lil girls

Minor G:

- m. In or around October 2020, a minor female who will be referred to for purposes of this Affidavit as "Minor G" was contacted and interviewed. Minor G is presently 16 years old and resides in Franklin County, Ohio. Minor G identified that she was the user of one of the Snapchat accounts with whom the memedaddy45 account user communicated. Minor G did not specifically recall her communications with the memedaddy45 account user. In reviewing her contact list on her Snapchat application, she found that the memedaddy45 account was on her blocked users list (indicating that she had intentionally blocked the memedaddy45 account so that she would not receive further communications from him). Minor G was also shown a photograph that was contained in the communications that depicted four female children. Minor G advised that she and her friend were depicted in the photograph.
- n. The records provided by Snapchat Inc. included communications between the memedaddy45 account user and Minor G's account during the approximate time period of July 11, 2018 through July 14, 2018. During the communications, the memedaddy45 account user told Minor G that he was 16 years old, and Minor G told him that she was 12 years old. Based on the context of the communications, it appeared that the memedaddy45 account user sent Minor G pictures of his penis. However, the pictures were not saved in Snapchat Inc.'s records. It therefore is reasonable to believe that the timer on the messages containing the pictures had expired, and the files were automatically deleted from the memdaddy45 Snapchat account. Minor G told the memedaddy45 account user that she did not like receiving the pictures.
- o. Based on their dates of birth, I determined that Minor G was approximately 12 years old and **REED** was approximately 23 years old at the time of the communications between the memedaddy45 account and Minor G's Snapchat account. Below are excerpts from their communications:

Minor G: Please don't send me pick pics
Minor G: Dick*^

memedaddy45: Aw you don't like it?
Minor G: No at all
.....
Minor G: How old are you
memedaddy45: 16
Minor G: Oh I like my men 12
memedaddy45: Hahaha wtf why
Minor G: Bc I'm 12
memedaddy45: Ok?
memedaddy45: Dont you like older boys?
Minor G: No
Minor G: What did you say
memedaddy45: Most girls your age love older boys
Minor G: not me
Minor G: sorry I have a boyfriend
memedaddy45: Our 6th grade cheer team sucks our football teams dick
Minor G: Oh
Minor G: Why do I care?
memedaddy45: Because I like you
Minor G: I HAVE A BOYFRIEND
memedaddy45: Idc
Minor G: ok well I do
.....
memedaddy45: How old is the girl on the right
*Sends image of what appears to be four female children
(which Minor G identified depicted her and her friend)*
Minor G: Which one? Like take a screenshot of the picture and circle
the person you're talking about
memedaddy45: *Sends the same image again, with a circle superimposed over
one of the female children*
Minor G: She's 12
memedaddy45: She's really adorable
Minor G: She has a man just sayin
memedaddy45: It's ok you're hotter. She's just really cute too
Minor G: thanks
memedaddy45: What's her snapchat?
Minor G: she doesn't have one
Minor G: Can you not send me a dick pick please
memedaddy45: You don't like it?
Minor G: I have a boyfriend so no I don't and I'm a child
memedaddy45: It's a good dick though right?
Minor G: No
memedaddy45: You know it is
Minor G: no

memedaddy45: *Sends unintelligible text*
 Minor G: I'm sorry but imma unadd you
 memedaddy45: Wait no
 memedaddy45: I'll stoo
 memedaddy45: Stop
 Minor G: Ok thanks
 memedaddy45: You're welcome
 memedaddy45: I'm sorry I thought you'd like it
 Minor G: no I'm sorry

Suspected Minor H:

- p. The records provided by Snapchat Inc. included communications between the memedaddy45 account user and another user who will be referred to for purposes of this Affidavit as "Suspected Minor H". The communications were dated during the approximate time period of November 10, 2018 through November 11, 2018. Suspected Minor H has not been identified and interviewed as of this time. During the communications, Suspected Minor H identified that she was 13 years old, and the memedaddy45 account user identified that he was 16 years old. Based on the communications, it appeared that the memedaddy45 account user solicited Suspected Minor H for nude pictures of herself. Below are excerpts from the communications:

memedaddy45: How old are you btw
 Suspected Minor H: how old r u
 memedaddy45: 16
 Suspected Minor H: 13
 memedaddy45: Lit
 Suspected Minor H: yep only 3 years
 memedaddy45: Are you a good girl or bad
 Suspected Minor H: why
 memedaddy45: Jw
 Suspected Minor H: bad girl
 Suspected Minor H: What school u go to
 memedaddy45: Homeschooled
 memedaddy45: Hbu
 Suspected Minor H: woms
 memedaddy45: Lit
 memedaddy45: Are you able to send
 Suspected Minor H: wha
 memedaddy45: Nudes
 Suspected Minor H: o
 memedaddy45: *Unintelligible text*
 memedaddy45: You first

Suspected Minor I:

- q. The records provided by Snapchat Inc. included communications between the memedaddy45 account user and another user who will be referred to for purposes of this Affidavit as "Suspected Minor I". The communications were dated on or around July 16, 2018. Suspected Minor I has not been identified and interviewed as of this time. During the communications, Suspected Minor I identified that she was 13 years old. Based on the context of the communications and my training and experience, it appeared that Suspected Minor I had sent pictures of herself (possibly nude pictures) to the memedaddy45 account user in the past. The memedaddy45 account user indicated that he wanted to engage in sexually explicit conduct with Suspected Minor I. Below are excerpts from the communications:

Suspected Minor I: I honestly don't mind you being 18
 memedaddy45: I love that you're 13
 Suspected Minor I: I'll be 14 in a few months
 memedaddy45: Aw my little angel is growing up
 Suspected Minor I: You have no idea how much that made me smile
 memedaddy45: I wish I could have fucked you when you were 12 tho
 Suspected Minor I: Whyyy
 memedaddy45: Because. Idk I like it

 memedaddy45: I see your body when ever the fuck I want
 Suspected Minor I: I don't send anymoreeee
 memedaddy45: Do you not trust me?
 Suspected Minor I: I do%2C I just don't send
 memedaddy45: Listen to your elder
 Memedaddy45: I'm an adult now
 Suspected Minor I: Oh shushhh
 memedaddy45: Seriously tho
 memedaddy45: I'm daddy
 memedaddy45: When you're not sending%2C I still get pics
 memedaddy45: When you're in a relationship%2C you still take my dick

Examination of the Galaxy Note 9 Cellular Telephone

31. On or around March 20, 2019, a search warrant was authorized by the Kettering Municipal Court for the examination of the Samsung Galaxy Note 9 cellular telephone that was seized from **REED** pursuant to his arrest. A detective trained in conducting forensic examinations of cellular telephones attempted to examine the device but was unable to do so based on the passcode contained on it.

32. The Centerville Police Department determined that Cellebrite Inc.⁴ had the capability of conducting an extraction of the contents of the locked Samsung Galaxy Note 9 cellular telephone. On or around May 22, 2019, a search warrant was authorized by the Kettering Municipal Court authorizing Cellebrite Inc. to conduct the extraction. A representative of Cellebrite Inc. thereafter extracted the contents of the telephone. The Centerville Police Department received the applicable extraction files from Cellebrite Inc. in or around August 2018 (after **REED** had been sentenced for the charges related to Disseminating Matter Harmful to Juveniles, case 2019CR805).
33. I, along with other officers involved in the investigation, have reviewed the results of the extraction of the Samsung Galaxy Note 9 cellular telephone. Below is a summary of some of the information noted during the review of the extraction:
- a. The telephone number for the device was 513-800-7127.
 - b. Various artifacts were recovered that corroborate that **REED** was in fact the user of the telephone. Below are examples of some of these artifacts:
 - i. The user name for the device was “**Scott Reed**”.
 - ii. Numerous images and videos were recovered from the telephone depicting **REED**. Also recovered from the telephone were images depicting two of **REED**’s driver’s licenses, and mail addressed to **REED**.
 - iii. At least approximately 18 documents were recovered from the telephone that contained **REED**’s name on them, such as check stubs, a resume, and an employment application form.
 - iv. In a text message exchanged with another user, the user of the telephone provided the other party to the communications with his Social Security Number (which matches **REED**’s Social Security Number). Also in approximately seven text messages exchanged with other users, the user of the telephone provided the other parties with his address (which matches the address where officers arrested **REED** in or around March 2019).
 - v. A Facebook social media account in the name of “**Scott Reed**” was established on the telephone.
 - vi. Email messages sent to and from the email address scottwessonreed@gmail.com were saved on the device.

⁴ Cellebrite Inc. is an Israeli-based digital intelligence company that provides tools to collect, review, analyze, and manage digital data from cellular telephones, tablets, and other mobile devices.

- c. Over three thousand image files and over one thousand video files were recovered from the telephone depicting child pornography. A PDF document was also recovered from the device that included approximately 43 images depicting child pornography. The child pornography files included images and videos depicting pre-pubescent minors, infants and toddlers, bondage and masochistic abuse, and bestiality. Most of the video files and a number of the image files were saved in a folder entitled "Language" and a sub-folder entitled ".fr". A number of other image files were saved in a file path that typically stores files that have been viewed on the Mega cloud storage application. By way of example, some of the child pornography files are described as follows:
- i. BcszCizL.jpg: The file is an image that depicts what appears to be a toddler-aged white female child who is wearing a shirt that is pulled up around her chest but no pants or underwear. The child's wrists are bound together with white tape. Each of the child's legs are also bound together with white tape and a rope, and there is white tape covering her mouth. The child's legs are spread apart, exposing her nude vagina to the camera.
 - ii. mSIXQKYI.jpg: The file is an image that depicts what appears to be a nude infant or toddler-aged white female child. The child's legs are spread apart, and a bottle is inserted into her vagina.
 - iii. 8 y.o. girl sucks dog dick.mp4: The file is a video that depicts what appears to be a nude pre-pubescent white female child performing fellatio on what appears to be a dog's penis. The video is approximately 48 seconds in duration.
 - iv. VID-20141113-WA0126.mp4: The file is a video that depicts what appears to be a nude toddler-aged white female child and a nude adult white male. The child and adult male are first depicted in a bathtub together. The child touches the adult male's penis and performs fellatio on the adult male. The child also stands up at one point, and the camera zooms in on her vagina and buttocks. The child and adult male are then depicted in another setting. The child again performs fellatio on the adult male. The adult male masturbates his penis and secretes what appears to be semen onto the child's vagina and abdomen. The video ends by displaying the following text: "Aint I good to you lol.....". The video is approximately three minutes and 36 seconds in duration.
 - v. VID-20141117-WA0043.mp4: The file is a video that begins by displaying the following caption: "Baby Lexa 2008". The video then depicts what appears to be a nude white female infant and an adult white male. The adult male inserts his penis into the baby's mouth, masturbates over the baby, rubs his penis onto and/or into the baby's buttocks, fondles the baby's vagina, and

secretes what appears to be semen and/or urine onto the baby's torso. The following caption is displayed at the end of the video: "What a sexy little baby cunt! Maybe I'll shit on the bitch next time!". The video is approximately one minute and 50 seconds in duration.

- vi. 135.mp4: The file is a video that depicts what appears to be a nude white male infant and an adult white male. The adult male masturbates over the baby, forcefully inserts his penis into the baby's mouth on multiple occasions, touches his penis onto the baby's penis, and secretes semen onto the baby's face. The baby is crying in apparent distress during various portions of the video. The video is approximately four minutes and 42 seconds in duration.
- vii. VID-20141118-WA0478.mp4: The file is a video that depicts what appears to be a nude pre-pubescent white female child. The child's arms are bound to her legs with a black material, and there is a mask around her eyes and a collar or strap around her neck. The adult male inserts an object and then his penis into the child's mouth. The adult male wraps a belt around the child's neck to pull her closer to him while she performs fellatio on him. The child then lays on her back with her legs spread apart, and the camera zooms in on her genitalia and anus. The man uses his fingers to spread apart the child's vagina and anus, and he rubs the object on her vagina. The video is approximately five minutes and 15 seconds in duration.
- d. The Kik messenger application was installed on the telephone. A Kik account with a username of "15yearsyoung22" and a profile name of "Chief" (followed by an emoticon) was saved on the device. Recovered from the device were messages exchanged between the 15yearsyoung22 account user and approximately 54 other users during the approximate time period of January 2019 through March 2019. It appeared, based on the context of the communications and my training and experience, that the 15yearsyoung22 account user discussed the exchange of child pornography files with some of the other users. In some communications, the 15yearsyoung22 account user received child pornography files from other users. In other communications, the 15yearsyoung22 account user and the other users exchanged sharing links to Dropbox and Mega accounts. In some communications, the 15yearsyoung22 account user and the other users appeared to discuss the possibility of trading child pornography files but never did so. Below are examples of some of these communications:
 - i. Messages exchanged with another user referred to for purposes of this Affidavit as "Kik User-1" during the approximate time period of January 10, 2019 through January 12, 2019 included the following:

Kik User-1: Trade

15yearsyoung22: S2r⁵
Kik User-1: *Sends two image files, one of which depicts child pornography and is described as follows:*

644ec614ca48c4ea39f5485c80948ba3: The file is an image that depicts what appears to be an adult white male performing cunnilingus on a nude pre-pubescent white female child. The 15yearsyoung22 account user received this file from Kik User-1 on or around January 10, 2019.

Kik User-1: Now you
15yearsyoung22: *Sends sharing link to a Drobox account*
15yearsyoung22: Your turn

- ii. Messages exchanged with another user referred to for purposes of this Affidavit as “Kik User-2” during the approximate time period of January 8, 2019 through January 21, 2019 included the following:

Kik User-2: Trade
15yearsyoung22: S2r
Kik User-2: *Sends image depicting child pornography, described as follows:*

b8343d14-80df-4c9f-86c4-255d0ec620a4.jpg: The file is an image depicting a collage of approximately 24 images – two depicting cartoons and the rest depicting child pornography and child erotica. By way of example, one of the child pornography files depicts what appears to be a pre-pubescent white female child performing fellatio on what appears to be an adult white male. The 15yearsyoung22 account user received this file from Kik User-2 on or around January 11, 2019.

Kik User-2: Trade
15yearsyoung22: *Sends sharing link to a Dropbox account*
Kik User-2: *Sends nine image files, at least two of which depict child pornography, one of which is described as follows:*

04f15016-c23c-4656-8db8-3004a06b9d94.jpg: The file is an image depicting what appears to be a pre-pubescent white female child and

⁵ Based on my training and experience, I know that “S2R” is a term to refer to “Send to Receive”. Individuals involved in child pornography offenses often utilize this term when communicating with other offenders. Such individuals use this term to instruct the other individuals that they must send child pornography before they can receive child pornography.

an adult white male. The adult male is pointing his penis very close to the child's face. The child's mouth is open, and there appears to be semen on her face. The 15yearsyoung22 account user received this file from Kik Uer-2 on or around January 13, 2019.

15yearsyoung22: Do you have the video for the ponytail girl?

- iii. Messages exchanged with another user referred to for purposes of this Affidavit as "Kik User-3" during the approximate time period of January 18, 2019 through March 2, 2019 included the following:

Kik User-3: You have any vids or drop box?

15yearsyoung22: S2r

Kik User-3: *Sends two image files, at least one of which depicts child pornography and is described as follows:*

d416527c-cacb-4328-8f72-999bbf562712.jpg: The file is an image depicting what appears to be a nude pre-pubescent Asian female child. The child is wearing stockings but is otherwise completely nude. The child is lying on a bed with her legs spread apart, exposing her nude genitalia. The 15yearsyoung22 account user received this file from Kik User-3 on or around February 3, 2019.

Kik User-3: I have no trade

Kik User-3: Looking for 8-15 yo vids

- iv. Messages exchanged with another user referred to for purposes of this Affidavit as "Kik User-4" during the approximate time period of January 6, 2019 through February 1, 2019 included the following:

Kik User-4: Hey

Kik User-4: What age do you trade

15yearsyoung22: Send to receive young

Kik User-4: Can I pay? I don't have much just pics I'm looking for videos

- v. Messages exchanged with another user referred to for purposes of this Affidavit as "Kik User-5" on or around January 8, 2019 included the following:

Kik User-5: Hello

Kik User-5: Hi

Kik User-5: Hello

15yearsyoung22: Hi

Kik User-5: Hello
Kik User-5: Do you have child sex porn?
Kik User-5: Hello
Kik User-5: Are you there
15yearsyoung22: Send to receive
Kik User-5: Ok
Kik User-5: Hello
Kik User-5: Are you there
15yearsyoung22: Send first

- e. The Snapchat application was installed on the telephone. A Snapchat account with a username of “memdaddy45” was saved on the device (the same account that was used to communicate with Minor A and Minor B as well as the suspected minors and identified minors detailed above). No contents from chat messages were recovered from the extraction of the telephone.
- f. Approximately four applications were installed on the telephone that are utilized to hide and password-protect image and video files.
 - i. Based on my training and experience, I know that individuals involved in child pornography offenses often use these applications to conceal their child pornography files from law enforcement officers and family members. Without knowledge of how the applications conceal the files and the passwords to the applications, the files often cannot be recovered during forensic examinations of the devices.
- g. An application for a Virtual Private Network (VPN) was installed on the telephone.
 - i. A Virtual Private Network, commonly known as a VPN, provides programming that creates a safe and encrypted connection over a less secure network, such as the public Internet. A VPN works by using a shared public infrastructure while maintaining privacy through security procedures and tunneling protocols. VPN’s assign users different IP addresses and run users’ data through different servers. As a result, it is very difficult (if not often virtually impossible) for third parties to track the users’ identities and browsing activities. Based on my training and experience, I know that individuals involved in child pornography offenses and other illegal activities sometimes use VPN’s to conceal their activities from law enforcement officers.

Review of Dropbox and Mega Sharing Links

34. In or around June 2020, an FBI task force officer attempted to access some of the Mega sharing links that were sent or received by the 15yearsyoung22 Kik account user, as

identified in the Kik messages recovered on the Samsung Galaxy Note 9 cellular telephone. At that time, none of the links were still active or accessible.

- a. The following message was displayed when the task force officer attempted to access approximately three of the links: "This folder/file was reported to contain objectionable content, such as Child Exploitation Material, Violent Extremism, or Bestiality. The link creator's account has been closed and their full details, including IP address, have been provided to the authorities."
 - b. The following message was displayed when the task force officer attempted to access approximately two of the links: "This link is unavailable as the user's account has been closed for gross violation of MEGA's Terms of Service."
35. Also in or around June 2020, an FBI task force officer attempted to access some of the Dropbox sharing links that were sent or received by the 15yearsyoung22 Kik account user, as identified in the Kik messages recovered on the Samsung Galaxy Note 9 cellular telephone. At that time, only one of the links was still active or accessible. The link contained approximately 118 image and video files that were saved in various folders. The images and videos primarily depicted children and young adults. At least one of the images and one of the videos depicted child pornography. More than 30 of the other images and videos depicted nude children and/or child erotica.

Other User Attribution for the Samsung Galaxy Note 9 Cellular Telephone

36. AT&T was identified as being the service provider for telephone number 513-800-7127 (the telephone number for the Samsung Galaxy Note 9 cellular telephone). On or around August 11, 2020, an FBI investigator served AT&T with an administrative subpoena requesting subscriber information for this telephone number. Records received in response to the subpoena identified that from approximately June 2013 through August 2019, **REED** was the user of the telephone number. **REED**'s father was listed as being the financially liable party for the number during the noted time period.
37. On or around July 29, 2020, an FBI task force officer and I attempted to interview **REED** at the Chillicothe Correctional Institution (where he was serving his sentence for case 2019CR805). **REED** declined to answer any questions.
38. On or around September 22, 2020, following **REED**'s release from custody on case 2019CR805, defense counsel for **REED** filed a motion requesting that the cellular telephone that was collected from **REED** pursuant to his arrest be returned to him. The motion was subsequently granted. After he was informed by the Centerville Police Department that the telephone was in the FBI's custody, **REED** contacted an FBI task force officer and requested that the telephone be returned to him. **REED** was informed that the device was being maintained pursuant to an ongoing investigation.

Conclusion Regarding Accounts and Telephone

39. Based on all of the information detailed in the Affidavit, there is probable cause to believe that **REED** is the user of the following:
- a. The memedaddy45 Snapchat account;
 - b. The 15yearsyoung22 Kik account; and
 - c. The Samsung Galaxy Note 9 cellular telephone that was seized from **REED** pursuant to his arrest.
40. There is also probable cause to believe the following:
- a. **REED** has utilized his memedaddy45 Snapchat account to coerce and entice minors, including Minor C (who resides in Montgomery County), to produce child pornography, as described above in paragraphs 30(a) through 30(c).
 - b. **REED** has utilized his memedaddy45 Snapchat account to transfer obscene materials to minors, including the video he sent to Minor C, as described above in paragraphs 30(a) through 30(c).
 - c. **REED** has utilized his Samsung Galaxy Note 9 cellular telephone and his 15yearsyoung22 Kik account to receive child pornography, including the files described above in paragraphs 33(d)(i) through 33(d)(iii).
 - d. **REED** has utilized his Samsung Galaxy Note 9 cellular telephone to possess child pornography, including the files described above in paragraphs 33(c)(i) through 33(c)(vii).
41. Based on my training and experience, I know that Samsung Galaxy Note 9 cellular telephones are manufactured outside of the state of Ohio. I also know that accessing Snapchat and Kik accounts requires the use of the Internet and thereby affects interstate or foreign commerce.

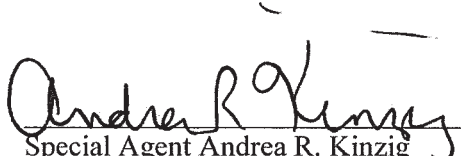
CONCLUSION

42. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that between on or around July 16, 2018 and July 17, 2018, in the Southern District of Ohio, **SCOTT WILLIAM REED**, in the Southern District of Ohio, knowingly used the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, to knowingly persuade, induce, entice, or coerce an individual who had not attained the age of 18 years (that being


Minor Female C), to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempted to do so, in violation of 18 U.S.C. § 2422(b).

43. I further submit that there is probable cause to believe that on or around July 16, 2018, in the Southern District of Ohio, **SCOTT WILLIAM REED** knowingly used the mail or any facility or means of interstate or foreign commerce to transfer obscene matter to another individual who had not attained the age of 16 years (Minor Female C), knowing that such other individual had not attained the age of 16 years, or attempted to do so, in violation of 18 U.S.C. § 1470.
44. I further submit that there is probable cause to believe that on or around January 10, 2019, in the Southern District of Ohio, **SCOTT WILLIAM REED** knowingly received any visual depiction using any means or facility of interstate or foreign commerce that has been mailed, shipped and transported in or affecting interstate or foreign commerce, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) & (b)(1).
45. I further submit that there is probable cause to believe that on or around January 11, 2019, in the Southern District of Ohio, **SCOTT WILLIAM REED** knowingly received any visual depiction using any means or facility of interstate or foreign commerce that has been mailed, shipped and transported in or affecting interstate or foreign commerce, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) & (b)(1).
46. I further submit that there is probable cause to believe that on or around February 3, 2019, in the Southern District of Ohio, **SCOTT WILLIAM REED** knowingly received any visual depiction using any means or facility of interstate or foreign commerce that has been mailed, shipped and transported in or affecting interstate or foreign commerce, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) & (b)(1).
47. I further submit that there is probable cause to believe that on or around March 20, 2019, in the Southern District of Ohio, **SCOTT WILLIAM REED** knowingly possessed at least one matter which contains any visual depiction that has been mailed, shipped and transported using any means and facility of interstate or foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of 18 U.S.C. §§ 2252(a)(4)(B) & (b)(2).

48. I therefore respectfully request that a criminal complaint be granted upon this Affidavit.


Special Agent Andrea R. Kinzig
Federal Bureau of Investigation

SUBSCRIBED and SWORN
before me this 2nd of December, 2021


Peter B. Silvain, Jr.
United States Magistrate Judge

